

Applicant respectfully submits that *Kochi* fails to disclose a number of elements of the claimed invention. Of course, “[a]nticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, *arranged as in the claim.*” *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 U.S.P.Q. 481, 485 (Fed. Cir. 1984) (emphasis added).

The Examiner asserts that *Kochi* discloses every element of the claimed invention. However, the passages of *Kochi* cited by the Examiner relate to two different embodiments disclosed in *Kochi*. The light reception means and the arithmetic means cited by the Examiner are part of the ninth embodiment of *Kochi* (*See, Kochi*, Col. 15, Lines 22-47), while the outputting means and the timing adjustment means are part of the sixth embodiment (*See, Kochi*, Col. 9 to Col. 11). As such, the outputting means of *Kochi* (i.e., outputs S1-S3) are not outputting means for outputting a result of the arithmetic operation means for each of the elements as required by the claimed invention. Similarly, the timing adjustment means of *Kochi*, purportedly being disclosed at column 11, lines 9-12, are not timing adjustment means for adjusting a timing at which the result of the arithmetic operation is to be outputted for each of the plurality of elements from the outputting means as required by the claimed invention. Accordingly, Applicant respectfully submits that *Kochi* clearly fails to anticipate the claimed invention and that this rejection be withdrawn.

Moreover, Applicant respectfully submits that elements from two different embodiments of an invention cannot anticipate the claimed invention because they are not arranged as in the claim which, as described above, is the standard for anticipation. For example, the outputting means cited by the Examiner as being disclosed in *Kochi* in the sixth embodiment cannot output a result of the arithmetic means cited by the Examiner as being disclosed in the ninth embodiment of *Kochi* for each of the elements as required by the claimed invention. Likewise, the timing adjustment means cited by the Examiner as being disclosed in *Kochi* in the sixth embodiment cannot adjust a timing at which the result of the arithmetic operation is to be outputted for each of the plurality of elements from the outputting means. Again, *Kochi* clearly fails to anticipate the claimed invention and Applicant respectfully submits that this rejection be withdrawn.

Furthermore, Applicant respectfully submits that *Kochi* fails to teach or even suggest combining the cited elements from the different embodiments as suggested by the Examiner. In

this regard, *Kochi* is primarily directed to a semiconductor device having a number of input terminals, a number of capacitor means having one terminal connected to one of the input terminals via a latch circuit, and a sense amplifier having an input portion that is commonly connected to the other terminals of the capacitor means. *See, Kochi*, Col. 2, Lines 17-24. As such, the majority of the disclosure of *Kochi* is directed to various configurations of these components, and not to various configurations of the elements cited by the Examiner as purportedly anticipating the claimed invention. Accordingly, *Kochi* does not teach or suggest the claimed invention.

In the Office Action, claims 2-4 and 7-9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kochi* as applied to claims 1 and 6 above, and further in view of Japanese Patent Document JP 7-105342 (*Yamada*). The Examiner primarily relies on *Kochi* in support of the rejection and therefore relies on *Yamada* to remedy the deficiencies of *Kochi*. Claims 2-4 and 7-9 depend either directly or indirectly from independent claims 1 and 6. As previously discussed, Applicant believes that *Kochi* fails to teach or suggest a number of features of the claimed invention as required by the independent claims, such as outputting means for outputting a result of the arithmetic operation means for each of the elements disposed in a matrix in the optical area. *Yamada* is cited merely for disclosing a storage means and step and a comparison operation. *Yamada* does not teach or suggest the outputting means for outputting a result of the arithmetic operation means for each of the elements disposed in a matrix in the optical area that is absent from *Kochi*. Therefore, even if one of ordinary skill in the art would have been motivated to combine the teaching of *Yamada* with that of *Kochi* (a point not conceded by Applicant), the resulting combination nonetheless fails to teach or suggest every element of the claimed invention. As such, the Examiner has failed to establish a prima facie case of obviousness and claims 2-4 and 7-9 must be allowed.

In the Office Action, claims 5 and 10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kochi* as applied to claims 1 and 6 above. Claims 5 and 10 depend either directly or indirectly from independent claims 1 and 6. As previously discussed, Applicant believes that *Kochi* fails to teach or suggest a number of features of the claimed invention as required by the independent claims, such as outputting means for outputting a result of the arithmetic operation means for each of the elements disposed in a matrix in the optical area. Therefore, Applicant respectfully submits that *Kochi* is deficient with respect to dependent

claims 5 and 10 for substantially the same reasons that *Kochi* is deficient with respect to the independent claims.

Applicant respectfully submits that *Kochi* fails to anticipate the claimed invention and moreover, fails to teach or even suggest a number of features of the claimed invention. Furthermore, even if *Kochi* is combinable with *Yamada*, the resulting combination fails to teach or suggest a number of features of the claimed invention. Thus, Applicant believes that claimed invention is clearly patentable in view of the cited references. Accordingly, Applicant respectfully submits that the anticipation rejection of claims 1 and 6 and the obviousness rejection of claims 2-5 and 7-10 be withdrawn.

Thus, for the foregoing reasons, Applicant respectfully requests reconsideration of the present application and earnestly solicits an early allowance of same.

Respectfully submitted,

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